

UNITED STATES BANKRUPTCY COURT
District of New Jersey

In re:)	
)	
Danny Y. Cheong)	Case No. 14-31583
)	
<i>Debtors</i>)	Chapter 13

MOTION TO EXTEND THE AUTOMATIC STAY
PURSUANT TO 11 U.S.C. §362(c)(3)

The Debtor respectfully requests that this Court extend the automatic stay, pursuant to 11 U.S.C. § 362(c)(3), and in support thereof state(s):

1. The Debtor filed this bankruptcy petition on 10/23/2014.
2. The Debtor previously filed bankruptcy, (Case #: **14-24169**) under Chapter 13 on 07/10/2014 and that case was dismissed on 09/19/2014.
3. The Debtor had no other pending bankruptcy cases in the preceding one-year period.
4. The prior case was dismissed on the debtor's failure to get confirmed on the basis of viability.
5. The automatic stay is scheduled to terminate on 11/22/2014.

WHEREFORE, the Debtor prays that this Court grant the Motion to Extend the Automatic Stay as to all creditors, after notice and opportunity to be heard, and for all other proper relief.

DATE: October 31, 2014
White Plains, NY

Respectfully Submitted.

/s/ DANIEL V. REMER
DANIEL V. REMER, ESQ.
THE LIGA LAW GROUP, P.C.
777 Westchester Avenue, Suite 101
White Plains, New York 10604
(877) 725-5442
(917) 591-8818 Fax
Attorney for the Debtor

UNITED STATES BANKRUPTCY COURT
District of New Jersey

In re:)
)
 Danny Y. Cheong) Case No. **14-31583**
)
)
) Chapter **13**
 Debtors

AFFIRMATION IN SUPPORT OF MOTION TO EXTEND
THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362(c)(3)

The Debtors in support of the *Motion to Extend the Automatic Stay*, state the following:

1. I am the above referenced Debtor.
2. I filed this bankruptcy petition on 10/23/2014.
3. I previously filed bankruptcy, (Case #: 14-24911-NLW) under Chapter 13 on 07/10/2014 and that case was dismissed on 09/19/2014.
4. We had no other pending bankruptcy cases in the preceding one-year period.
5. The prior case was dismissed for my failure to be confirmed and in part on the objection of 1st Constitution Bank. **My debt of 1st Constitution Bank was discharged in my previous Chapter 7 case (11-44304-MS). And, it was never reaffirmed.**
6. The current case was filed in good faith.
7. We intend to fully cooperate with our attorneys and this Court to successfully reorganize of my debts and to save my home.
8. We believe that with the support of my son I will have the necessary income to successful modify our mortgage and to make all required Chapter 13 plan payments.

9. I believe that my Chapter 13 Plan, when finalized, can and will be confirmed.

We affirm under the penalty of perjury that the foregoing is true and correct to the best of our information and belief.

DATE: October 31, 2014
White Plains, NY

/s/ DANNY Y CHEONG
DANNY Y. CHEONG
Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

United States Bankruptcy Court
51 Walnut Street
Newark, New Jersey 07102

In Re:

DANNY Y. CHEONG

Case No.: **14-31583-TBA**

Adv. No.:

Hearing Date: **11/20/2014 @ 11:00 AM**

Judge: **DONALD H. STECKROTH**

ORDER

The relief set forth on the following pages, numbered two (2) through 2 is
hereby **ORDERED**.

Pursuant to 11 U.S.C. § 362(c)(3), the Debtor's motion to extend the automatic stay is hereby GRANTED.
